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5 Attorney for Debtor
Ophelia Alvarez
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7 UNITED STATES BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 In re:) Chapter 13
10 Ophelia Alvarez,) Bankruptcy No.: 19-30319
11 Debtor.) **OPPOSITION TO MOTION TO DISMISS**
12) **CASE**
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OPPOSITION TO MOTION TO DISMISS CASE

15 The trustee filed a motion to dismiss this case shortly after the debtor missed a
16 continued meeting of creditors. Debtor has had trouble procuring necessary payment
17 advices and other documents needed to proceed with the meeting of creditors. She has,
18 however, made progress that shows a good faith effort.

19 Debtor believes that, no later than the hearing on the motion to dismiss, she can
20 correct the following items on the motion to dismiss: #1, 3, 4, 5, 6, 8, 9, 11, 12, 13, 14, 15,
21 16, 17, 18. On the remaining items, significant progress or partial compliance can be
22 made, and remaining items can be fixed within a month. Additionally, debtor will attend
23 the next meeting of creditors,
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25 Debtor's counsel has been away from the office for three of the last four weeks, and
26 this has made it difficult to exchange documents and meet at mutually convenient time.
27 The time away was planned beforehand, but the missing documents led to this case being
28 pushed out repeatedly, into the time away from the office. He will, however, be back

1 next week and the week after so progress can be made at correcting the items as described
2 above.

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4 Dated: July 3, 2019

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7 /s/ Jason Honaker

8 Jason Honaker
9 Attorney for Debtor
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